

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 18-141
)	
SHELBY SUMMER BROWN)	

UNOPPOSED MOTION TO EXTEND THE TIME
FOR FILING PRETRIAL MOTIONS

Shelby Summer Brown, through her counsel, Assistant Federal Public Defender Sarah Levin, respectfully files this Unopposed Motion to Extend the Time for Filing Pretrial Motions, and in support, counsel states:

1. On July 13, 2018, Ms. Brown was arraigned on an indictment charging violations of, *inter alia*, 18 U.S.C. §§ 2423(a), (d), and (e).
2. Pursuant to Local Criminal Rule 12 and prior Court Order, pretrial motions are due on August 26, 2019.
3. A sentencing hearing is scheduled for January 14, 2020, in relation to an Information filed at Criminal No. 19-261. This sentencing will obviate the need for filing pretrial motions in this case.
4. Accordingly, counsel for Ms. Brown respectfully moves this Court for an extension from September 25, 2019 until January 14, 2020 to file pretrial motions.
5. The government, through Assistant United States Attorney Heidi M. Grogan, has no objection to the relief requested in this motion.

6. For these reasons, Shelby Summer Brown respectfully requests that the deadline for filing pretrial motions be extended from September 25, 2019, to January 14, 2020.

Respectfully submitted,

/s/ Sarah Levin

Sarah Levin

Assistant Federal Public Defender